



MEMO ENDORSED

STEIN | SAKS, PLLC

YAAKOV SAKS▲*
JUDAH STEIN▲
ELIYAHU BABAD▲
MARK ROZENBERG▲
HASAN SIDDIQUI▲
RAMI SALIM▲

▲ NJBar Admissions
- NY Bar Admission

*Federal Court Bar Admissions

AR, CT, CO, DC, IL, MI, MO, ND, NE, NM, TN, TX, WI

One University Plaza, Suite 620, Hackensack, NJ 07601 | tel: 201.282.6500 | fax: 201.282.6501 | www.steinsakslegal.com

August 7, 2024

Via CM/ECF

The Honorable Gary Stein
United States District Court
Southern District of New York

Application granted. The deadlines in Paragraphs 7(a) and 7(e) of the Case Management Plan and Scheduling Order (Dkt. No. 12) shall be extended to September 20, 2024 and September 13, 2024, respectively. Further, the status conference previously scheduled for August 20, 2024 (Dkt. No. 13) is hereby adjourned to September 18, 2024 at 10:00 a.m. All other information contained in the Court's orders at Docket Numbers 12 and 13 remains operative. The Clerk of Court is respectfully directed to close Docket Number 16.

Re: Wahab v. VM E-Commerce, Inc. SO ORDERED.
Case #: 1:24-cv-01558-DEH-GS

Dear Judge Stein:

Dated: August 8, 2024
New York, New York

Gary Stein
United States Magistrate Judge
Southern District of New York

This law firm represents Plaintiff in the above-referenced matter. We write with Defendant's gracious consent to respectfully request that the Status Conference currently scheduled for August 20, 2024, be adjourned because it conflicts with a pre-planned vacation for Plaintiff's counsel on the west coast, including a family wedding. Plaintiff's counsel will be out of office from August 13 through August 21.

Your Honor had ordered all depositions to be completed by August 15, and end of fact discovery by August 22.

Defendant has noticed Plaintiff's deposition to take place on August 8. However, Plaintiff's counsel has been ill this week, resulting in his inability to prepare for this deposition. Plaintiff's counsel is still recovering, but the Parties have agreed in principle to hold the deposition the week of September 9, should Your Honor approve. Therefore, given the above circumstances, Plaintiff respectfully requests that depositions and end of fact discovery be extended through mid-September 2024.

We thank Your Honor and the Court for its kind considerations and courtesies.

Respectfully submitted,

s/ Mark Rozenberg
Mark Rozenberg, Esq.

cc: All Counsel of Record via ECF